

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

DEREK SHEEHAN,

Defendant

) Criminal No. 18Cr10391
)
) Violations:
)
) Counts One through Three:
) Sexual Exploitation of Children
) (18 U.S.C. §§ 2251(a) and (e))
)
) Forfeiture Allegation:
) (18 U.S.C. § 2253)

INDICTMENT

COUNT ONE

Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury charges that:

On various dates beginning on a date unknown to the Grand Jury, but no later than March 16, 2017, through on or about April 8, 2018, in the District of Massachusetts, the defendant,

DEREK SHEEHAN,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, "Minor A," to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT TWO
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges that:

On various dates beginning on a date unknown to the Grand Jury but no later than July 5, 2018, through on or about July 14, 2018, in the District of Massachusetts, the defendant,

DEREK SHEEHAN,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor B,” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

COUNT THREE
Sexual Exploitation of Children
(18 U.S.C. §§ 2251(a) and (e))

The Grand Jury further charges that:

On or about July 17, 2018, in the District of Massachusetts, the defendant,

DEREK SHEEHAN,

did knowingly employ, use, persuade, induce, entice, and coerce a minor, “Minor C,” to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and the visual depiction was produced and transmitted using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and attempted to do so.

All in violation of Title 18, United States Code, Sections 2251(a) and (e).

CHILD PORNOGRAPHY FORFEITURE ALLEGATION
(18 U.S.C. § 2253)

1. Upon conviction of any of the offenses in violation of Title 18, United States Code, Section 2252A(a)(5)(B), set forth in Counts One through Three of this Indictment, the defendant,

DEREK SHEEHAN,

shall forfeit to the United States of America, pursuant to Title 18, United States Code, Section 2253, (i) any visual depiction described in sections 2251, 2251A, 2252, 2252A, 2252B, or 2260 of Chapter 110 of Title 18, or any book, magazine, periodical, film, videotape, or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped, or received in violation of Chapter 110 of Title 18; (ii) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from such offenses; and (iii) any property, real or personal, used or intended to be used to commit or to promote the commission of such offenses or any property traceable to such property.

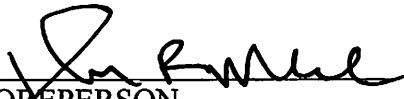
2. If any of the property described in Paragraph 1, above, as being forfeitable pursuant to Title 18, United States Code, Section 2253, as a result of any act or omission of the defendant—


- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intention of the United States of America, pursuant to Title 18, United States Code, Section 2253(b), incorporating Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the property described in Paragraph 1 above.

All pursuant to Title 18, United States Code, Section 2253.


A TRUE BILL


FOREPERSON



ANNE PARUTI
ASSISTANT UNITED STATES ATTORNEY
DISTRICT OF MASSACHUSETTS

District of Massachusetts: OCTOBER 25, 2018
Returned into the District Court by the Grand Jurors and filed.


DEPUTY CLERK
10/25/18 @ 2:05pm